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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 IN RE CALIFORNIA BAIL BOND
ANTITRUST LITIGATION

Master Case No. 4:19-CV-00717-JST

**DECLARATION OF KATHERINE LUBIN
IN SUPPORT OF PLAINTIFFS'
OBJECTION TO REPLY EVIDENCE**

16 THIS DOCUMENT RELATES TO:

17 All Actions
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1 I, Katherine Lubin, declare as follows:

2 1. I am a partner at the law firm of Lieff Cabraser Heimann & Bernstein, LLP,
3 Interim Class Counsel in this action. I make this declaration in support of Plaintiffs' Objection to
4 Reply Evidence pursuant to Local Rule 7-3(d)(1). I have personal knowledge of the facts herein
5 and, if called upon to testify to those facts, I could and would do so competently.

6 2. Attached hereto as **Exhibit 1** is a printout from the website of Lucky Bail Bonds,
7 available at: <http://www.luckybail.com/> (last visited August 10, 2020).

8 3. Attached hereto as **Exhibit 2** is a printout of a blog post dated March 1, 2013,
9 available on an archived version of the website for Chickie's Bail Bonds:
10 [https://web.archive.org/web/2019*/http://chickiesbailbonds.com/2013/05/01/scoop-from-the-coop-](https://web.archive.org/web/2019*/http://chickiesbailbonds.com/2013/05/01/scoop-from-the-coop-issue-3/)
11 [issue-3/](https://web.archive.org/web/2019*/http://chickiesbailbonds.com/2013/05/01/scoop-from-the-coop-issue-3/) (last visited August 10, 2020). The internet archive reflects that the webpage was captured on
12 July 12, 2019. Plaintiffs' counsel already reviewed this webpage as part of their factual investigation,
13 and it is the "only other public acknowledgement" to which Plaintiffs refer in the Second
14 Consolidated Amended Complaint: "Plaintiffs have been able to identify only one other public
15 acknowledgement among the thousands of California bail agents about their rebating authority under
16 Proposition 103." SCAC ¶ 92.

17 4. Defendants' Reply brief (ECF No. 123 at 29) refers to the following link:
18 <http://chickiesbailbonds.com/2013/05/01/scoop-from-the-coop-issue-3/>. The link is not accessible.
19 Attached hereto as **Exhibit 3** is a printout of the page that appears as of August 10, 2020 when I
20 attempted to access the blog post using the link provided by Defendants. Attached hereto as
21 **Exhibit 4** is a printout of the page that appears when I attempted to access the webpage of
22 Chickie's Bail Bonds, www.chickiesbailbonds.com, on August 10, 2020.

23 5. On August 10, 2020, I searched Google for "California bail rebates." Among the
24 results was a link to the webpage for Ajua Bail Bonds. Attached hereto as **Exhibit 5** is a printout
25 of from the website of Ajua Bail Bonds, available at: <http://www.ajuabailbonds.com/> (last visited
26 August 10, 2020). The first search result was a link to a story in the *Los Angeles Times* regarding
27 this case.

28 I declare under penalty of perjury under the laws of the United States that the foregoing is

1 true and correct.

2 Executed on August 10, 2020 in Truckee, California.

3 

4 _____
5 Katherine Lubin